

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTSFILED
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UNITED STATES OF AMERICA,)	CRIM. NO. 04-30046-MAP
)	DISTRICT COURT DISTRICT OF MASS.
V.)	
JOSEPH SULLIVAN, ET AL.)	
Defendants)	JUNE 12, 2006
)	

**MOTION OF DEFENDANT JOSEPH SULLIVAN
TO MODIFY CONDITIONS OF RELEASE**

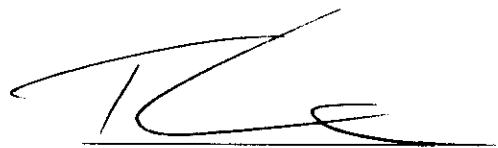
Now comes the Defendant, Joseph Sullivan, and moves that the conditions of his pre-sentencing release, restricting his travel to the Commonwealth of Massachusetts and surrounding New England states be modified.

The Defendant seeks permission to travel to North Carolina for a family vacation from Thursday, August 3, 2006 until Tuesday evening August 15, 2006. Mr. Sullivan will be staying at 1205 Ocean Boulevard, Topsail Beach, North Carolina 28445. The cottage the Defendant will be staying in is rented from Ward Realty Corp. located at 116 South Topsail Drive, Surfcity, North Carolina 28445. The telephone number for Ward Realty Corp. is 1-800-782-6216. Additionally, Mr. Sullivan will have his cell phone, telephone number 413-335-3930, for throughout the vacation.

Counsel for the Defendant has conferred with counsel for the government and the government does not oppose the allowance of this motion.

Wherefore the Defendant respectfully requests that the within motion be allowed.

The Defendant
Joseph Sullivan,
By His Attorney,



Thomas Kokonowski, Esq.
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CERTIFICATE OF SERVICE

I, Thomas Kokonowski, Esquire, counsel of record, do hereby certify that I have served a copy of the foregoing motion by mail, to all attorneys of record on this 12th day of June, 2006.



Thomas Kokonowski, Esq.